

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

LEN STOLER, INC. d/b/a LEN STOLER)	
AUDI,)	
)	
Plaintiff,)	
)	Case No. 1:15-cv-1659-TSE/JFA
v.)	
)	
VOLKSWAGEN GROUP OF AMERICA, INC.)	
d/b/a AUDI OF AMERICA, INC.,)	
)	
Defendant.)	

DEFENDANT AUDI OF AMERICA, INC.'S WITNESS LIST

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Scheduling Order dated May 16, 2016 (Dkt. No. 21) Defendant Audi of America, Inc. ("AoA") hereby lists the witnesses it expects to call at trial, those it may present if the need arises, and those whose testimony it expects to present by deposition. AoA reserves the right to call a witness not listed, solely for impeachment or rebuttal, or in the event of unfair surprise.

Witnesses AoA Expects to Call

1. Cody Thacker
2. Paul Ritsema
3. Mark Balmer
4. Reinhard Fischer
5. David Smith
6. Jay Lytle
7. Mark Schmitz
8. Barry Stoler

9. Leonard Stoler

10. David Leibowitz

Witnesses AoA May Call if the Need Arises

11. Kyle Mathews

12. Peter Hamilton

13. Jeremy Meyer

14. Fred Galata

15. Joseph Roesner

16. Todd Berko

In addition to the witnesses listed above, AoA reserves the right to call any and all witnesses called by Plaintiff.

Witnesses Whose Testimony AoA Expects to Present by Deposition

AoA has designated portions of Stoler's Rule 30(b)(6) testimony and testimony of corporate officers Len Stoler and Barry Stoler. Designations will be provided to opposing counsel at or before the final pretrial conference.

Dated: March 16, 2017

Respectfully submitted,

/s/ _____
Richard Mark Dare (VSB No. 14146)
ISLERDARE PC
1945 Old Gallows Road, Suite 650
Tysons Corner
Vienna, Virginia 22182
T: (703) 748-2690
F: (703) 748-2695
mdare@islerdare.com

/s/ _____
Michael S. Elvin (*pro hac vice*)
Daniel R. Fine (*pro hac vice*)
Jack O. Snyder, Jr. (*pro hac vice*)
Emily L. Gesmundo (*pro hac vice*)
BARACK FERRAZZANO
KIRSCHBAUM & NAGELBERG LLP
200 West Madison Street, Suite 3900
Chicago, Illinois 60606
T: (312) 984-3100
F: (312) 984-3150
michael.elvin@bfkn.com
dan.fine@bfkn.com
jack.snyder@bfkn.com
emily.gesmundo@bfkn.com

Counsel for Defendant Volkswagen Group of America d/b/a Audi of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 2017, I served a true and accurate copy of the foregoing by filing it electronically with the Clerk of the Court using CM/ECF system, which will send a notification of such filing (NEF) to the following:

Barbara S. Wahl, Esq.
Arent Fox LLP
1717 K Street, N.W.
Washington, DC 20006
barbara.wahl@arentfox.com

Russell P. McRory, Esq.
Arent Fox LLP
1675 Broadway
New York, NY 10019
russell.mcrory@arentfox.com

Sean Nicholas Clerget, Esq.
Arent Fox LLP
1717 K Street NW
Washington, DC 20036-5344
sean.clerget@arentfox.com

/s/
R. Mark Dare, Va. Bar No. 14146
ISLERDARE PC
1945 Old Gallows Road, Suite 650
Vienna, VA 22182
(703) 748-2690
(703) 748-2695 (fax)
mdare@islerdare.com
Counsel for Defendant
Volkswagen Group of America, Inc.
d/b/a Audi of America, Inc.